

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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AO 91 (Rev. 08/09) Criminal Complaint

JUL 06 2011

UNITED STATES DISTRICT COURT

TONY R. MOORE, CLERK
BY  DEPUTY

for the
Western District of Louisiana

United States of America)

v.)

Robert E. CUFF)

Defendant(s)

Case No.

11-MS-00059

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2009 - August 2010 in the county of Caddo in the
Western District of Louisiana, the defendant(s) violated:

Code Section

Title 18 United States Code,
Section 2251(d)(1) & (e)

Offense Description

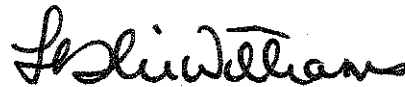
Conspiracy to Advertise the Distribution of Child Pornography

Title 18 United States Code,
Section 2252A(a)(2)(A) & (b)(1)

Conspiracy to Distribute Child Pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

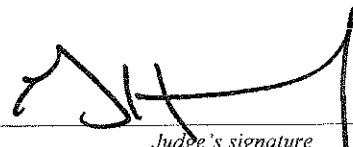
Leslie Williams, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 6, 2011

City and state: Shreveport, Louisiana


Judge's signature

Mark L. Hornsby, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Leslie Williams, being duly sworn and deposed, state the following:

INTRODUCTION

1. Your affiant is a Special Agent with the Department of Homeland Security, Homeland Security Investigations [hereinafter HSI] currently assigned to the Office of the Resident Agent in Charge Shreveport, Louisiana and has been so employed since June 2009. Your affiant is responsible for investigations involving the production, importation, advertising, receipt, and distribution of child pornography which occur in the Western District of Louisiana.
2. As a Special Agent, I have received training and have gained experience in the investigation of criminal violations enforced by Homeland Security Investigations enumerated in Titles 18 and 19 of the United States Code. Specifically, I received twenty-three weeks of training at the Federal Law Enforcement Training Center in Glynco, Georgia.
3. Your affiant was previously employed with the West Monroe Police Department in West Monroe, Louisiana for nine years, serving approximately four and a half years as a detective responsible for investigating internet crimes against children and was a member of the Federal Bureau of Investigation (FBI) Innocent Images and Cyber Crimes Task Force, the Northeast Louisiana Internet Crimes Against Children (ICAC) Task Force and the Department of Justice Project Safe Childhood – Western District of Louisiana. Your affiant has received training through the FBI Innocent Images and Cyber Crimes Center and the U.S. Department of Justice Project Safe Childhood in the areas of child pornography and child sexual exploitation, as well as specialized instruction in conducting investigations of individuals suspected of possessing, receiving and distributing child pornography.

PROBABLE CAUSE

4. Beginning on or about the 22nd day of March 2009, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, Robert E. CUFF, DOB 11/11/1962, the defendant herein, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown, to commit the crimes of advertising child pornography and distributing child pornography in violation of Title 18 United States Code, Section 2251(d)(1) & (e) and Title 18 United States Code, Section 2252A(a)(2)(A) & (b)(1).
5. HSI learned through an investigation that a subject using the screen names, DD0040 (aka SLAPALOT), was a member of a private child pornography bulletin board, hereinafter "Bulletin Board A," dedicated to the advertisement and distribution of hardcore child

pornography. Further investigation revealed that Robert E. CUFF was using the screen names DD0040 (aka SLAPALOT) to access "Bulletin Board A."

6. In order to gain access to "Bulletin Board A" an individual was required to post child pornography to the board, and then had to be granted membership by "Administrator A." Once gaining membership, each member could access the board using a login screen name and password. "Bulletin Board A" listed specific rules, in order to gain membership to the board. Individuals seeking membership were required to upload a certain amount of child pornography to a separate website and provide "Administrator A" with preview images and the web address and password for the complete files. "Administrator A" required that the images either contain hard core activity or nudity, and that the minors depicted were under 13. "Administrator A" stated that membership would not be granted unless these specific rules are followed.
7. Members of the board were segregated into a hierarchy of four membership levels by "Administrator A." Each level of membership permitted access to more content on "Bulletin Board A." An individual could move up in membership level based upon the number and frequency of posts. The highest membership level consisted of individuals who produced their own child pornography material.
8. The main webpage of "Bulletin Board A" was divided into five different areas, and within each of these areas were different sections referred to as "forums." The forums generally reflected the type of images or videos contained therein. Some of these forums included:
 - a. "Homemade Posts Only"
 - b. "PT Vids"
 - c. "Boys"
 - d. "Super Hardcore"
 - e. "Over 14 Videos and pictures"
 - f. "Over 18 passwords"
 - g. "Chat"
9. "Bulletin Board A" also contained specific rules for the type of content to be posted in the forums. For example:
 - a. The "Super Hardcore" forum, was described as containing material of very young children "getting fucked" and "preteens in distress, and or crying." The rules stated that if the child looks "totally comfortable" then the child is not in distress and the material did not belong in the "Super Hardcore" section.
 - b. The "Homemade Posts Only" forum was described on the main page as a section for only "producers." Within the forum, the rules stated that it was an exclusive section and only individuals that made their own material can access this forum.

- c. The "PT Vids" section was described on the main board as a section for videos only and the minors depicted could not be over the age of 13.
10. Within each forum, a member of "Bulletin Board A" could make a posting which was referred to as a "topic." "Bulletin Board A" contained hundreds of topic posts distributing and advertising child pornography. Within these posts, members provided preview images of the child pornography they were making available for other members along with the web address and user created password where the complete image collection or video of child pornography could be downloaded.
11. Through the board's rules, instructions were provided to all members regarding how to post preview images and how to make the complete images and videos available on another website. Members were instructed to upload the full images or video to a separate website, and require a password in order to download and decrypt the files. In the topic post advertising the child pornography, members were instructed to alter a part of the web address so that it could not function as a hyperlink; this modification required another member, seeking to view the advertised content, to manually enter the web address into an Internet browser and make the appropriate changes for the web address to be valid.
12. HSI Special Agents captured information related to a member using the screen names DD0040 (aka SLAPALOT). Included on the "Bulletin Board A" profile for DD0040 (aka SLAPALOT) were the following statistics:
 - a) User joined the bulletin board on March 22, 2009.
 - b) User made 43 posts, some of which contained prepubescent child pornography as defined by United States Code, Section 2256.
 - c) User was assigned to the second level of membership, VIP.
 - d) User posted most frequently in the "PT Vids" section.
 - e) User supplied the email dd0040@hotmail.com during member registration.
13. Agents identified the member SLAPALOT logging onto "Bulletin Board A" using an IP address operated by the internet service provider (ISP) Time Warner Cable.
14. An administrative subpoena/summons was served to Time Warner requesting information related to the user who was assigned to the IP address. Subpoena/summons responses from Time Warner showed the IP address resolved to an Internet Account assigned to Robert CUFF.
15. DD0040 provided the MSN email address, dd0040@hotmail.com during registration on "Bulletin Board A." A search warrant return from MSN revealed emails that included an image of CUFF, an email that identified Robert CUFF'S occupation and place of employment, an email that referenced "Bulletin Board A" and other emails that were associated with child pornography websites. IP logs from MSN showed the same IP

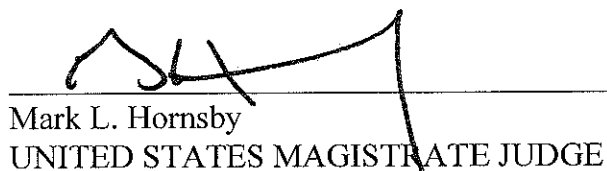
address that was used to access "Bulletin Board A" was also used in March 2010 to access the dd0040@hotmail.com email account.

16. "Bulletin Board A" had over 600 members who posted advertisements offering to distribute child pornography in the same manner as DD0040 (aka SLAPALOT). At least one of the members during the conspiracy, Edward Oedewaldt, was located in the Western District of Louisiana, and advertised and distributed child pornography from the Western District of Louisiana.
17. Based upon the above information, Robert E. CUFF did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown, to commit the crimes of advertising child pornography and distributing child pornography in violation of Title 18 United States Code, Section 2251(d)(1) & (e) and Title 18 United States Code, Section 2252A(a)(2)(A) & (b)(1).



Leslie Williams
Special Agent
U. S. Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me on this 6th of July 2011.



Mark L. Hornsby
UNITED STATES MAGISTRATE JUDGE